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May 17, 2012

Marlene H. Dortch, Secretary
Federal Communications
445 Twelfth Street, SW
Washington, DC 20554

Re: *Ex Parte* Presentations, ET Docket No. 08-59
Amendment of the Commission's Rules to Provide Spectrum for the
Operation of Medical Body Area Networks

Dear Ms. Dortch,

On March 16, 2012, David Siddall, counsel to Philips Healthcare (Philips), discussed Philips' concerns with the delay inherent in the Commission's proposed procedures to appoint an MBAN spectrum coordinator with Julius Knapp, Chief of the Commission's Office of Engineering and Technology. On May 17, 2012, Mr. Siddall also communicated the same concerns by email to Charles Mathias, Special Counsel to the Chairman; Renee Wentzel, Legal Advisor to the Chairman; and Louis Peraertz, Legal Advisor to Commissioner Clyburn.

Philips does not object to the Further Notice of Proposed Rulemaking (Further Notice) and proposed appointment process, but is concerned that the uncertainty will delay introduction in hospitals of complete wireless MBAN systems. Appointment of one or more coordinators does not end the process, of course, because there still will be much work for the designated coordinator(s) with the primary spectrum coordinator (AFTRCC) to agree upon the many complex details of how to jointly coordinate this spectrum and set up the systems necessary for doing so.

It would help significantly to reduce the effects of uncertain timing if the Commission in its Report and Order and Further Notice would articulate clear self-imposed deadlines for resolving the Further Notice and subsequent appointment(s), concluding that at least one MBAN spectrum coordinator will be appointed no later than May 1 (or June 1) 2013, which the staff has suggested is the latest likely time. Clearly articulating dates will make it more likely than otherwise that the process will be completed within the reasonably expected time frame.

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This relatively simple measure will provide everyone involved specific expectations and allow funding of the necessary research and development, etc., to be conducted with a clear idea of when full life-saving MBAN systems might be introduced in hospitals.

Pursuant to Section 1.1206 of the Commission's rules, an electronic copy of this letter is being filed for inclusion in the above-reference docket and emailed to Commission recipients.

Sincerely,

A handwritten signature in black ink, appearing to read "D R Siddall". The signature is fluid and cursive, with the first letters of the first and last names being capitalized and prominent.

David R. Siddall
Counsel to Philips Healthcare